

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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MICHAEL KRECHMER, a/k/a
"Michael Malice,"

Plaintiff,

-- against --

ANDREA K. TANTAROS and
ASTERO, LLC,

Defendants.

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Case No. 16-cv-7820 (KBF)

NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon (a) the accompanying Declaration of Judd Burstein, Esq., dated November 21, 2016, with attached exhibits, (b) the Declaration of Andrea K. Tantaros, dated November 21, 2016, with attached exhibits, (c) the accompanying Memorandum of Law, (d) Defendants Andrea K. Tantaros and Astero, LLC's (collectively, "Defendants") Statement Pursuant to Local Rule 56.1, (e) the Court's Order converting Defendants' Motion to Dismiss pursuant to Fed R. Civ. P. 12(b) into a Motion for Summary Judgment pursuant to Fed R. Civ. P. 56, and (f) all of the prior proceedings heretofore had herein, Defendants will move this Court, before the Honorable Katherine B. Forrest, at the Courthouse located at 500 Pearl Street, Courtroom 23B, New York, New York 10007, at a date and time to be set by the Court, for an Order (a) granting Summary Judgment to Defendants dismissing the Complaint Pursuant to Fed. R. Civ. P. 56, and (b) granting a preliminary injunction prohibiting Plaintiff Michael Krechmer, a/k/a Michael Malice ("Plaintiff"), from violating the confidentiality provision of the Collaboration Agreement during the pendency of the sealing order in this case, together with such other and further relief as this Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that pursuant to the Court's Order, entered on November 15, 2016, papers in opposition, if any, shall be served upon the undersigned no later than Monday, December 5, 2016.

Dated: New York, New York
November 21, 2016

JUDD BURSTEIN, P.C.

By

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